



December 4, 2018

VIA CM/ECF & HAND DELIVERY

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
844 North King Street, Room 6325, Unit 26
Wilmington, DE 19801-3555

Daniel M. Silver
Partner
T. 302-984-6331
F. 302-691-1260
dsilver@mccarter.com

Re: *Novartis Pharmaceuticals Corporation v. Accord Healthcare, Inc., et al.*,
C.A. No. 18-1043-LPS

Dear Chief Judge Stark:

McCarter & English, LLP
Renaissance Centre
405 N. King Street, 8th Floor
Wilmington, DE 19801-3717
T. 302.984.6300
F. 302.984.6399
www.mccarter.com

Plaintiff Novartis Pharmaceuticals Corporation ("Novartis") and Defendants Zydus Pharmaceuticals (USA) Inc. and Cadila Healthcare Limited (collectively "Zydus") write to request the scheduling of a discovery teleconference.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confers (by telephone) on October 26, 2018, and November 20, 2018:

- For Novartis: Paul Torchia from Gibson, Dunn & Crutcher, LLP, and Benjamin Smyth from McCarter & English, LLP
- For Zydus: Emily Savas from Locke Lord LLP, and Jack Phillips from Phillips, Goldman, McLaughlin & Hall, P.A.

The issues requiring judicial attention are listed below:

- The sufficiency of Zydus's disclosure of ESI custodians and non-custodial data sources
- Zydus's responses and objections to certain requests for production set forth in Novartis's First Set of Common Requests for the Production of Documents and Things to all Defendants
- Zydus's responses and objections to certain interrogatories set forth in Novartis's First Set of Common Interrogatories to all Defendants.

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Respectfully Submitted,

/s/ Daniel M. Silver

Daniel M. Silver (#4758)

cc: Counsel of record (via electronic mail)